

AMERICA'S  
PUBLIC  
TELEVISION  
STATIONS

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

January 28, 1999

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room GW-B204  
Washington, DC 20554

Re: MM Docket No. 98-203 Motion of the  
Association of America's Public Television  
Stations for an Extension of Time for  
Comment Deadlines

Dear Ms. Salas:

Attached is the original and one copy of the Motion of the Association of America's Public Television Stations for an Extension of Time for Comment Deadlines for filing with the Secretary's office.

Should any questions arise concerning this filing, please contact me at (202) 887-8401.

Sincerely,



Marilyn Mohrman-Gillis  
Vice President, Policy and Legal Affairs

cc: Mass Media Bureau

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
 ) MM Docket No. 98-203  
Ancillary or Supplementary Use of Digital )  
Capacity by Noncommercial Licensees )

To: The Commission

MOTION OF THE  
ASSOCIATION OF AMERICA'S PUBLIC TELEVISION STATIONS  
FOR AN EXTENSION  
OF TIME FOR COMMENT DEADLINES

The Association of America's Public Television Stations ("APTS") hereby requests the Commission to extend the Comment period established in the above-captioned proceeding by fifteen (15) days, which would require filing on February 15, 1999. APTS also requests a corresponding extension of the Reply Comment date to March 15, 1999.

APTS is a non-profit membership organization that represents the public television stations before Congress and the FCC. For the reasons stated below, APTS believes there is good cause for the FCC to provide a brief extension of these deadlines.

In this proceeding, the Commission has asked for comment on the ancillary and supplementary use of digital television capacity by noncommercial licensees. This proceeding is of critical importance to public television stations. The ability to use digital capacity for ancillary and supplementary services will be an important source of revenue for public

television's transition to digital broadcasting and the provision of expanded digital services.

Given the potential implications of this proceeding, APTS has been working diligently to formulate a consensus position among the public television stations and organizations. A brief extension will allow for further dialogue within the industry on the issues raised in the Commission's notice.

There are a series of meetings scheduled at the end of January involving the presidents of the organizations and their boards at which discussion of these issues can occur. APTS believes that a brief extension of fifteen days will provide an opportunity for these industry-wide discussions to take place and potentially be reflected in our filing with the Commission.

Furthermore, an extension of time will allow the APTS Board, which is also scheduled to meet at the end of January, an opportunity to review the policy positions we plan to present to the Commission.

We believe that this request for a modest extension of time will serve the Commission's goal of generating a full and complete record that reflects the views of all affected parties.

Respectfully submitted,

ASSOCIATION OF AMERICA'S PUBLIC TELEVISION STATIONS

*Marilyn Mohrman-Gillis*

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Marilyn Mohrman-Gillis  
Vice President, Policy and Legal  
Affairs

Lonna M. Thompson  
Director, Legal Affairs

1350 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 887-1700

January 27, 1999